

NJID 784768

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TRUST A/K/A M&T BANK S/B/M HUDSON CITY SAVINGS BANK

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: : CHAPTER 13
ANTHONY V SYLVANDER A/K/A
ANTHONY SYLVANDER : CASE NO. 16-26979-RG

Debtor : **NOTICE OF MOTION FOR
RELIEF FROM CO-DEBTOR
STAY PURSUANT TO 11 USC
SECTION 1301(c)**

ANTHONY V SYLVANDER A/K/A	SUSAN S. LONG, Esquire
ANTHONY SYLVANDER	140 EAST RIDGEWOOD AVENUE
50 CARLTON PL	SUITE 415
RUTHERFORD, NEW JERSEY 07070-1120	PARAMUS, NJ 07652
FARIBA SYLVANDER	MARIE-ANN GREENBERG, Trustee
50 CARLTON PL	30 TWO BRIDGES RD
RUTHERFORD, NEW JERSEY 07070-1120	SUITE 330
	FAIRFIELD, NJ 07004

PLEASE TAKE NOTICE that on 11/15/2017, at 10:30 AM or as soon as counsel may be heard, the undersigned attorney for the secured creditor will move before the United States Bankruptcy Court, 50 WALNUT ST., 3RD FLOOR, NEWARK, New Jersey for an Order Vacating Co-debtor Stay with respect to property located at 50 CARLTON PL, RUTHERFORD, NEW JERSEY 07070-1120 and allowing CITIMORTGAGE, INC., SERVICER FOR MANUFACTURERS AND TRADERS TRUST A/K/A M&T BANK S/B/M HUDSON CITY SAVINGS BANK to continue its contractual remedies or other remedies that may be available under state law, by reason of failure of the debtor to make regular monthly mortgage payments outside the Chapter 13 Plan.

PLEASE TAKE FURTHER NOTICE, that in support of the within Motion, the Movant will rely upon the Certification in Support and the proposed Order submitted herewith, as well as, oral arguments, if necessary. Pursuant to D.N.J. LBR 9013-2, Movant

states that no brief or memorandum of law is necessary because of the absence of novel or complex questions of law. However, if responsive papers are filed in opposition to the Motion, the Movant reserves the right to respond to any issues of law raised therein in the form of a brief or a memorandum of law.

Dated: September 15, 2017

/s/ James P. Shay
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